

**QUINN EMANUEL URQUHART  
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Brothers Holdings Inc.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:
	: Chapter 11
	: Case No. 08-13555
	(SCC)
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
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**NOTICE OF PRESENTATION OF STIPULATION CONCERNING  
LIST OF NON-OBJECTING PARTIES ANNEXED AS EXHIBIT A  
TO THE ORDER GRANTING MOTION TO ALLOW  
DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES  
PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

**PLEASE TAKE NOTICE** that the undersigned request presentment of the annexed so ordered stipulation concerning the list of non-objecting parties annexed as Exhibit A To the order granting motion to allow disclosure of the derivative questionnaires pursuant to section 107(a) of the Bankruptcy Code (the “Proposed Order”) to the Honorable Shelley C. Chapman, United States Bankruptcy Judge, for signature on **July 7, 2015 at 10:00 a.m.** (prevailing Eastern time).

**PLEASE TAKE FURTHER NOTICE** that responses or objections, if any, to the Proposed Order must be in writing, must conform to the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the Local Rules of the Bankruptcy Court for the

Southern District of New York, must set forth the name of the objecting party, the basis for the objection and the specific grounds therefore, and must be filed with the Bankruptcy Court, by **July 6, 2015 at 4:00 p.m.** (prevailing Eastern Time) electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the Electronic Case Filing System may be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official website for the Bankruptcy Court) by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-242, and any objection must further be served upon: (i) Quinn Emanuel Urquhart & Sullivan, LLP, 51 Madison Avenue, New York, New York 10010, Attn. Andrew J. Rossman, Diane Hutnyan, Scott C. Shelley and Lindsay M. Weber; (ii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006 New York, NY 10014, Attn. Andy Velez-Rivera, Paul Schwartzberg, Brian Masumoto, Linda Riffkin and Tracy Hope Davis; (iii) Curtis, Mallet-Prevost, Colt & Mosle LLP, 101 Park Avenue, New York, New York, 10179, Attn. Lynn Harrison 3rd, Turner P. Smith, Theresa A. Foudy and Peter J. Behmke, and (iv) Shearman & Sterling, LLP, 599 Lexington Avenue, New York, NY 10022, Attn. Douglas P. Bartner and Stacey L. Corr-Irvine. Unless objections are timely received in accordance with this paragraph, the Proposed Order may be entered without a hearing.

**PLEASE TAKE FURTHER NOTICE** that if a written objection is timely filed, a hearing will be held on the next omnibus hearing date scheduled in these cases. The

objecting parties are required to attend the hearing, and failure to appear may result in relief being granted or denied upon default.

Dated: June 24, 2015  
New York, New York

**QUINN EMANUEL URQUHART  
& SULLIVAN, LLP**

By: /s/ Andrew J. Rossman  
Andrew J. Rossman  
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